

Exhibit X.B.2.b - Policies and procedures governing hiring and retention of the disabled

PHYSICAL AND MENTAL QUALIFICATION

Traditions will ensure that the physical and mental job qualifications are related to the specific job of jobs for which the person is being considered and are consistent with business necessity and safe performance of the job. Traditions will regularly review its personnel procedures to ensure that careful and thorough consideration is given to the job qualifications of individuals with disabilities, who are applicants and employees.

REASONABLE ACCOMMODATIONS

Traditions will make reasonable accommodations to the physical and mental abilities of employees with disabilities.

Attempts to accommodate disabled individuals will include assuring that new and remodeled facilities are designed and constructed with a minimum of architectural barriers and making modifications to equipment and adjustments in the working environment.

Without limitation, the following items have been and will continue to be given consideration to accommodate individuals covered by the ADA.

1. Use of ramps in lieu of stairs.
2. Continuous handrails in stairwells.
3. Adjusting the height of drinking fountains.
4. Locating parking facilities close to ramps or level accesses.
5. Identifying barriers in the work area or job and making reasonable accommodations necessary for effective job performance.
 - a. Existing Employees - When an existing employee expresses a need for modification of the physical environment to accommodate a disability, such request will be submitted to the EEO/AA Officer who will review the request. In the event that the specific request cannot be granted, other reasonable accommodations will be considered to provide equal opportunity for the employee with a disability.
 - b. Applicants - All persons who are considered for employment will be apprised of essential job functions. When a qualified applicant with a disability, is selected for a job offer, but requires modification of the physical environment, such request will be submitted to the EEO Office. In the event that the specific request cannot be granted, other reasonable accommodations will be considered to provide equal employment opportunity.

Exhibit X.B.2.b

DOCUMENTATION

The EEO/AA Officer shall use the Reasonable Accommodation Form to document all accommodations requests under the Americans with Disabilities Act or applicable State or local laws.

COMMUNICATION

Traditions will communicate its policy regarding the employment and advancement in employment of qualified Americans with disabilities in the following manner:

- Enlisting the assistance and support of recruitment sources such as the state employment services, sheltered workshops, college placement offices, state education agencies and social service organizations serving individuals with disabilities.
- Establishing cooperative and supportive working relationships with recruitment sources for the disabled.
- The adoption of policy statements will be included in the Company's policy manual.
- All employees, executives, managers and supervisors, who will be engaged in employment, placement and training of personnel, will receive additional training on applicable local, state and federal equal employment opportunity laws for the Americans with Disabilities Act of 1990.
- Traditions' Equal Employment Opportunity Policy regarding the Americans with Disabilities Act will be distributed to all employees, and such policy will be included in the formalized personnel practices.
- Americans with Disabilities Act posters will be permanently displayed in conspicuous places through the facility so the same may be viewed by employees and applicants for employment.

Exhibit X.B.2.b

RESPONSIBILITY FOR IMPLEMENTATION

Traditions' executive management will support the EEO/AA Officer in the establishment and implementation of policies and procedures which effectuate the equal employment opportunity to employ and advance qualified Americans with disabilities throughout the company. Day-to-day responsibility for implementation will rest with the EEO/AA Officer who will have the responsibility for:

1. Monitoring and reporting implementation of the program.
2. Serving as liaison with compliance agencies of the federal, state and municipal governments.
3. Keeping management informed with respect to the latest development in equal employment opportunity for disabled workers.

PROCEDURE FOR PROCESSING INTERNAL COMPLAINTS FILED BY INDIVIDUALS WITH DISABILITIES

It is the intent of Traditions to conduct our business in such a manner so as to preclude any form of discrimination. However, in the event an internal complaint is filed by an employee or applicant, the EEO/AA Officer will be notified immediately. He/she will undertake efforts to resolve the complaint within fourteen (14) days after the complaint has been filed.

All informal and formal complaints will initially be investigated by the EEO/AA Officer. After consultation with the department involved and possible legal consultation, the EEO/AA Officer will make recommendations to management as to the most appropriate course of action to be followed in handling the complaint. If it is determined that errors have been made or that reasonable accommodation should be granted, such corrections or accommodations shall be implemented within a reasonably prompt period of time.

New hire employees are made aware of the role of the EEO/AA Officer at orientation programs and through periodic training sessions. Therefore, employees with disabilities, as well as all employees, are aware of their internal options to grieve any alleged discriminatory violations. They are advised of the steps involved in the process of where and how to file a grievance.

PROCEDURE FOR PROCESSING EXTERNAL COMPLAINTS FILED BY INDIVIDUALS WITH DISABILITIES

It is Traditions' intent to conduct our business in such a manner so as to preclude any form of unlawful discrimination. However, in the event that an external complaint is filed by an employee or applicant, the EEO/AA Officer should be notified immediately. He/she will undertake efforts to resolve the complaint within the required amount of time after the complaint has been filed.

Exhibit X.B.2.b

Complaints filed with EEOC or any other governmental agency by employees will be referred to the Legal Dept. or outside counsel for handling. Traditions will cooperate in good faith in any resulting governmental investigation.

No individual shall be intimidated, threatened, coerced, or retaliated against by management or any other employees for filing any complaint or participating in any investigation regarding equal employment opportunities.